author index

12 months ended December 1986

Abbin, Byrle M.
Significant recent developments concerning estate planning. Part I—86:344. Part II—86:406.

Barr, David B.
Tax treatment of videocassettes: an unresolved dilemma in a booming business. 86:289.

Begley, Kevin H.
Is apparent relief for R&D limited partnerships short lived? 86:550.

Bostwick, William J.
Seller financing in the private sector. 86:576.

Bower, David R.
An analysis of the final regulations under Sec. 704(b). 86:328.

Broberg, Brad D.
Is apparent relief for R&D limited partnerships short lived? 86:550.

Campbell, Alan D.
Minimizing the self-employment tax. 86:271.

Carlson, David K.
Significant recent developments concerning estate planning. Part I—86:344. Part II—86:406.

Cash, L. Stephen
Planning for an installment redemption of a shareholder's stock under Sec. 302(b)(3). 86:448.

Christner, Wallace E.
Seller-financed transactions: the new imputed interest rules. 86:728.

Clark, James S.
Tax Division comments on IRS practitioner policies. 86:529.

Courtnage, Christine L.
Year-end tax planning for individuals after the Tax Reform Act of 1986. 86:713.

Crawford, John L.
Regs. Sec. 1.9100: a second chance to make the election. 86:144.

Curatola, Anthony P.
Tax provisions of Series E and EE government bonds. 86:47. Using charitable contributions of perishable inventory to increase cash flow. 86:805.

Dalebout, Richard S.
The relief of liabilities under Sec. 752(b) when a distributee partner receives payments under Sec. 736. 86:166.

Dickens, Thomas L.
Planning for an installment redemption of a shareholder's stock under Sec. 302(b)(3). 86:448. Claiming rental losses *and* rolling over gain on principal residences. 86:484.

Dillaway, Manson P.
Estate planning for controlling shareholders. 86:12.

Ferguson, Carol B.
The need for the 1986 Graduate Tax Education Symposium. 86:300.

Fiore, Nicholas J.
For the Tax trends column, see the contents page of each issue.

Florio, Nicholas M.
Valuing amortizable intangible assets: are they being wasted? 86:544.

Fowler, Anna C.
The continuing saga of start-up costs and their identification. 86:244.

Geis, Robert H., Jr.
Seller-financed transactions: the new imputed interest rules. 86:728.

Goggans, Travis P.
Disclaimers as premortem and postmortem estate planning tools. 86:77.

Harmon, Michael R.
Disclaimers as premortem and postmortem estate planning tools. 86:77.

Helpern, Martin
Partnership classification under the Internal Revenue Code. 86:172.

Hillier, Jeffrey S.
Automobile valuation and substantiation: on the road again. 86:200.

Hira, Labh S.
Simplified employee pensions: an alternative to qualified plans. 86:264. IRS provides much needed guidance on welfare benefit funds. 86:585.

Hogan, Lynn M.
Automobile valuation and substantiation: on the road again. 86:200.

Hoskins, Bradley G.
An analysis of the final regulations under Sec. 704(b). 86:328.

Hreha, Karen S.
The taxation of boot in reorganizations. 86:373.

Hurst, Brenda Robert
Tax provisions of Series E and EE government bonds. 86:47.

Izard, C. Douglass
Tax planning using electronic spreadsheets on the microcomputer. 86:40.

Johnston, Mike
The effect of the Tax Reform Act of 1986 on tax shelters. 86:696.

Joszef, Jerry
Partnership classification under the Internal Revenue Code. 86:172.

Karl, Edward S.
Meeting with IRS Associate Commissioner (Operations). 86:595.

LaGreca, Frank J.
Valuing amortizable intangible assets: are they being wasted? 86:544.

Lewis, Sandra K.
For the Thumbtax column, see the contents page of each issue.

Magnuson, William J.
The Tax Reform Act's hidden impact on oil and gas. 86:777.

Maloney, David M.
Tax treatment of videocassettes: an unresolved dilemma in a booming business. 86:289.

Maples, Lawrence D.
Timing considerations in making accounting changes. 86:519.

author index

12 months ended December 1986

Abbin, Byrle M.
Significant recent developments concerning estate planning. Part I—86:344. Part II—86:406.

Barr, David B.
Tax treatment of videocassettes: an unresolved dilemma in a booming business. 86:289.

Begley, Kevin H.
Is apparent relief for R&D limited partnerships short lived? 86:550.

Bostwick, William J.
Seller financing in the private sector. 86:576.

Bower, David R.
An analysis of the final regulations under Sec. 704(b). 86:328.

Broberg, Brad D.
Is apparent relief for R&D limited partnerships short lived? 86:550.

Campbell, Alan D.
Minimizing the self-employment tax. 86:271.

Carlson, David K.
Significant recent developments concerning estate planning. Part I—86:344. Part II—86:406.

Cash, L. Stephen
Planning for an installment redemption of a shareholder's stock under Sec. 302(b)(3). 86:448.

Christner, Wallace E.
Seller-financed transactions: the new imputed interest rules. 86:728.

Clark, James S.
Tax Division comments on IRS practitioner policies. 86:529.

Courtnage, Christine L.
Year-end tax planning for individuals after the Tax Reform Act of 1986. 86:713.

Crawford, John L.
Regs. Sec. 1.9100: a second chance to make the election. 86:144.

Curatola, Anthony P.
Tax provisions of Series E and EE government bonds. 86:47. Using charitable contributions of perishable inventory to increase cash flow. 86:805.

Dalebout, Richard S.
The relief of liabilities under Sec. 752(b) when a distributee partner receives payments under Sec. 736. 86:166.

Dickens, Thomas L.
Planning for an installment redemption of a shareholder's stock under Sec. 302(b)(3). 86:448. Claiming rental losses *and* rolling over gain on principal residences. 86:484.

Dillaway, Manson P.
Estate planning for controlling shareholders. 86:12.

Ferguson, Carol B.
The need for the 1986 Graduate Tax Education Symposium. 86:300.

Fiore, Nicholas J.
For the Tax trends column, see the contents page of each issue.

Florio, Nicholas M.
Valuing amortizable intangible assets: are they being wasted? 86:544.

Fowler, Anna C.
The continuing saga of start-up costs and their identification. 86:244.

Geis, Robert H., Jr.
Seller-financed transactions: the new imputed interest rules. 86:728.

Goggans, Travis P.
Disclaimers as premortem and postmortem estate planning tools. 86:77.

Harmon, Michael R.
Disclaimers as premortem and postmortem estate planning tools. 86:77.

Helpern, Martin
Partnership classification under the Internal Revenue Code. 86:172.

Hillier, Jeffrey S.
Automobile valuation and substantiation: on the road again. 86:200.

Hira, Labh S.
Simplified employee pensions: an alternative to qualified plans. 86:264. IRS provides much needed guidance on welfare benefit funds. 86:585.

Hogan, Lynn M.
Automobile valuation and substantiation: on the road again. 86:200.

Hoskins, Bradley G.
An analysis of the final regulations under Sec. 704(b). 86:328.

Hreha, Karen S.
The taxation of boot in reorganizations. 86:373.

Hurst, Brenda Robert
Tax provisions of Series E and EE government bonds. 86:47.

Izard, C. Douglass
Tax planning using electronic spreadsheets on the microcomputer. 86:40.

Johnston, Mike
The effect of the Tax Reform Act of 1986 on tax shelters. 86:696.

Joszef, Jerry
Partnership classification under the Internal Revenue Code. 86:172.

Karl, Edward S.
Meeting with IRS Associate Commissioner (Operations). 86:595.

LaGreca, Frank J.
Valuing amortizable intangible assets: are they being wasted? 86:544.

Lewis, Sandra K.
For the Thumbtax column, see the contents page of each issue.

Magnuson, William J.
The Tax Reform Act's hidden impact on oil and gas. 86:777.

Maloney, David M.
Tax treatment of videocassettes: an unresolved dilemma in a booming business. 86:289.

Maples, Lawrence D.
Timing considerations in making accounting changes. 86:519.

Martin, M. Jill Lockwood
Seller financing in the private sector. 86:576.

Massoglia, Donald J.
Sec. 704(b) final regulations pose "substantial" interpretation problems. 86:472.

McConnell, Christopher P.
Highlighting the Tax Reform Act of 1986 for individuals. 86:616. Year-end tax planning for individuals after the Tax Reform Act of 1986. 86:713.

McCormick, Leslie L.
The current use of tax planning software in CPA firms. 86:524.

Misiewicz, Kevin M.
The current use of tax planning software in CPA firms. 86:524.

Nelson, Davis W.
Post-reconstruction Sec. 367: new rules and new dangers. 86:102.

Nordhauser, Susan
Trade or business status: recent judicial interpretations. 86:112.

Odmark, Robert C.
Corporate AMT rules under the Tax Reform Act of 1986. 86:656.

Orbach, Kenneth N.
The blended annual rate of Rev. Rul. 86-17 and Prop. Regs. Sec. 1.7872-13(a). 86:400.

Parsons, Chris B.
Year-end tax planning for individuals after the Tax Reform Act of 1986. 86:713.

Pennacchio, Stephen
The IRS limits the benefit of fringes. 86:213.

Perry, Paul
IRS provides much needed guidance on welfare benefit funds. 86:585.

Ranzal, Gerald H.
The foreign provisions of the Tax Reform Act of 1986: an overview. 86:768.

Savage, Allan H.
Estate planning for controlling shareholders. 86:12.

Schnee, Edward J.
The taxation of boot in reorganizations. 86:373.

Shapiro, Leslie S.
Professional responsibility in the eyes of the IRS. 86:136.

Slattery, Daniel M.
Trade or business status: recent judicial interpretations. 86:112.

Smith, W. Robert
Using charitable contributions of perishable inventory to increase cash flow. 86:805.

Snook, Susan Brown
The Tax Reform Act's hidden impact on oil and gas. 86:777.

Soich, Anthony K.
Excess loss accounts: an overview. 86:671.

Stewart, Dave N.
The relief of liabilities under Sec. 752(b) when a distributee partner receives payments under Sec. 736. 86:166.

Streer, Paul J.
Like-kind exchanges of real property: the element of intent. 86:4.

Streuling, G. Fred
The relief of liabilities under Sec. 752(b) when a distributee partner receives payments under Sec. 736. 86:166.

Thomas, Deborah
Who is a return preparer? 86:740.

Thomas, Kenneth F.
The need for the 1986 Graduate Tax Education Symposium. 86:300. Tax Division comments on IRS practitioner policies. 86:529. Meeting with IRS Associate Commissioner (Operations). 86:595.

Tillman, Gary L.
Corporate AMT rules under the Tax Reform Act of 1986. 86:656.

Tracy, Thomas G.
The effect of the Tax Reform Act of 1986 on tax shelters. 86:696.

Turner, Joanne H.
Ensuring the deductibility of employee use of listed property. 86:798.

Vaughan, Jack M.
Year-end tax planning for individuals after the Tax Reform Act of 1986. 86:713.

Walker, Deborah
The IRS limits the benefit of fringes. 86:213.

White, Richard A.
Claiming rental losses *and* rolling over gain on principal residences. 86:484.

Wiesner, Philip J.
Sec. 704(b) final regulations pose "substantial" interpretation problems. 86:472.

Willens, Robert
An analysis of the reverse triangular merger regulations. 86:72. The corporate provisions of the Tax Reform Act of 1986. 86:624.

Woo, Hong-Yuen T.
Using charitable contributions of perishable inventory to increase cash flow. 86:805.

Yang, Wesley
Post-reconstruction Sec. 367: new rules and new dangers. 86:102.

Zimmerman, John
The DRA expands the innocent spouse provisions. 86:294.

Tax clinic editors

Diss, William T.
Jan. 86:25.

Ferrero, Henry J., Jr.
Dec. 86:784.

Glennon, Richard M.
June 86:362.

Harrill, Roy B.
Nov. 86:721.

Josephs, Stuart R.
May 86:277.

Milefsky, Norman R.
April 86:221.

Nad, Leon M.
July 86:423.

Norman, John L., Jr.
Sept. 86:557.

Ochsenschlager, Thomas
Feb. 86:85.

O'Connell, Frank J., Jr.
Oct. 86:636.

Padwe, Gerald W.
March 86:151.

Rosen, Robert M.
Aug. 86:497.

Tax practice management editors

Sandvik, Wilhelm L.
Dec. 86:810.

Tabin, Harvey
June 86:380.

subject index

12 months ended December 1986

Accounting methods and periods
Accruals under Sec. 461. 86:222.
Bad debt reserves. 86:251.
Below-market loans
blended annual rate. 86:400.
prepayments. 86:425.
regulations. 86:601.
seller-financing. 86:576, 728.
Captive insurance companies
premiums. 86:228, 423.
Casinos
progressive jackpots. 86:533.
Change in method
affirmative action. 86:239.
timing considerations. 86:519.
Change of annual accounting period. 86:753.
Closely held entity
payments to owners. 86:35, 60.
Completed contract method
unique items. 86:238.
Consolidated return filers
different accounting methods. 86:365.
Contingent service contracts
recognition of income. 86:159.
Government bonds
Series E and EE. 86:47.
Improper method
tax-free reorg. 86:507.
Installment method
dealers in personal property. 86:226.
proposed regulations. 86:601.
wraparound debt. 86:437.
year-end receivables. 86:574.
Interest synchronization. 86:456.
Inventory
finished goods from purchased entity. 86:509, 725, 790.
LIFO conformity. 86:793.
LIFO inventory bulk purchase. 86:283, 790.
Long-term contract accounting
final regulations. 86:181.
OID
cash method borrowers. 86:223.
proposed regulations. 86:382.
reporting. 86:303.
seller financing. 86:576, 728.
small seller-financed sales. 86:151, 445.
tax-exempt bonds. 86:240.
Public utilities. 86:516.
Rescissions. 86:36.
Sec. 467 rental agreements. 86:436, 790.
Seller financing. 86:576, 728.
Start-up costs. 86:244.
Thor Power rules
warehouse arrangement. 86:54, 231.
Unisex annuity tables. 86:302
Wraparound mortgages. 86:97.

Charitable contributions
Bargain sales
appreciated property. 86:756.
real estate. 86:235.
Charitable remainder trusts
gifts of buildings. 86:32.
timing. 86:640.
Direct to individuals. 86:308.
Donations of nonpublicly traded securities. 86:252.
Noncash contributions
perishable inventory. 86:805.
substantiating and reporting. 86:265.
Qualified conservation contributions. 86:284, 796.

Consolidated returns
Acquired corp.
estimated tax
pre-affiliation. 86:39.
Construction period interest. 86:364.
Different accounting methods. 86:365.
Discharge of indebtedness income
stock basis adjustments to avoid. 86:157.
Excess loss accounts. 86:671.
Filing
failure of parent. 86:823.
Subsidiary's basis step-up. 86:446, 788.

Corporate divisions
See "Reorganizations and corporate divisions."

Corporations
Accumulated earnings
expansion plans. 86:305.
working capital
irregular operating cycle. 86:93.
Alternative tax
large corporation. 86:278.
new legislation. 86:656.
Anti-churning rules
related corporations. 86:230.
Cooperatives
netting patronage dividends and losses. 86:572.
substantially all test. 86:574.
Personal holding companies
software development companies. 86:224.
Principal shareholder
common stock surrender. 86:457.
Subchapter S, see "Subchapter S corporations."
Tax Reform Act of 1986
alternative minimum tax. 86:656.
corporate highlights. 86:624.

Credits against tax
Foreign tax credit
effect of deemed and consent dividends. 86:223.
overall foreign losses. 86:252.
Sec. 367, effect of. 86:102.
tax reform, effect of. 86:99.
Fuel from nonconventional sources. 86:283.
Investment
cars. 86:53.
leases to controlled corporation's noncorporate lessor. 86:725.
passthrough of credit
partnership to close corporation. 86:258.
recapture
contribution to partnership. 86:320.
Sec. 338 election effect. 86:164.
trade or business requirement. 86:112.
TV variety shows. 86:607.
videocassettes. 86:289.
Possessions tax credit. 86:531.
Research and development
recapture
sale of subsequent technology. 86:56.

Depreciation
ACRS
cars. 86:53, 748.
straight-line elections. 86:568.
videocassettes. 86:289.
Amortization of income interest. 86:164.
Amortization of intangible assets. 86:544.
Intangibles
received in business acquisition. 86:86, 544.
Recapture
sale of technology. 86:791.
Trade or business requirement. 86:112.

Employees' plans and trusts
See "Pensions."

ERISA
See "Pensions."

Estate planning
Administration expenses. 86:559.
Charitable contributions
charitable remainder trusts
gifts of buildings. 86:32.
Controlling shareholders. 86:12.
Disclaimers. 86:77, 680.
Estates and trusts
bequests
unspecified assets with specified FMV. 86:761.
distributions
deduction. 86:573.
emergency power. 86:513.
trust corpus. 86:26.
Irrevocable voting trust
stock held by. 86:513.
Life insurance. 86:644.
Lifetime property transfers
adjustment clauses. 86:515.
planning with. 86:95.
Recent developments. 86:344, 406.
Statute of limitations. 86:286.
Stock redemptions
annual agreements. 86:33.
Trust ownership
corpus borrowed and repaid. 86:537.
Unamortized Sec. 189 expense. 86:164.
Valuation
special use
remote successive interests. 86:532.
statute of limitations. 86:286.

Estates and trusts
See "Estate planning."

Estate tax
Administration expenses
deduction. 86:559.
Credit for prior transfers
multiple transferors. 86:124.
Installment obligation
cancelled on payee's death. 86:539.
Sec. 6166
interest deduction. 86:282.
relationship with Sec. 303. 86:506.

Excise taxes
CIF insurance premium. 86:786.
Foundations
sale of appreciated assets. 86:788.

Exempt organizations
Advertising in professional journal. 86:391.
Bargain sales of real estate. 86:235.
Church tax inquiries. 86:383.
Private foundations
excess business holdings. 86:498.
Related party rule. 86:226.
Second-tier excise taxes. 86:455.
Subsidiaries. 86:438, 500, 507.
Support organizations. 86:786.
VEBAs
geographic limitations. 86:688.

Expenses
Business
abandoned public offering costs. 86:428.
accrued estimated medical expenses. 86:654.
apartment building renovations. 86:762.
autos. 86:52, 200, 428.
bad debt reserves. 86:251.
clergyman's housing allowance. 86:566.
compensation
family unincorporated business. 86:163.
fringe benefits. 86:213, 812.
VEBA for single employee. 86:189.
construction period interest and taxes. 86:364.
employee's computer purchase. 86:386.
employee use of listed property. 86:52, 798.
golden parachute arrangements. 86:101.
intangible drilling costs timing. 86:90.
malpractice insurance trust medical corporation. 86:192.
personal residence
leasing pursuant to sale. 86:93, 121.
proxy contests. 86:28.
start-up costs. 86:244, 440.
trade or business status. 86:112.

travel expenses
recordkeeping. 86:52, 200.
standard mileage rate. 86:812.
Interest, see "Interest income and expenses."
Payments
closely held entity to owners. 86:35, 60.
Preproduction expenses. 86:638.
Product liability losses. 86:681.
R&D expenses
limited partnerships. 86:550.
Sec. 280A
home office
distance from residence. 86:155.
principal place of business. 86:192.
rented to employer. 86:536.
vacation homes. 86:792.
Start-up costs. 86:244.

Foreign income and taxpayers
Accumulated DISC income. 86:282.
Below-market loans
international aspects. 86:94.
FIRPTA withholding
repossessions and foreclosures. 86:370.
Foreign subsidiary
loss on liquidation. 86:434.
FSC rules
investment income and carrying charges. 86:441.
small exporters. 86:237.
IC-DISCs. 86:383.
ISO planning. 86:428.
Migrant farm workers
FICA taxation. 86:153.
Netherlands tax treaty
exploratory oil rig. 86:158.
Overall foreign losses. 86:252.
Resident alien departing
principal residence sale. 86:785.
Sec. 367. 86:102.
Tax Reform Act of 1986
foreign provisions. 86:768.
Transfers to foreign firms. 86:456.
Transnational transactions
use of S corps. 86:37.
Unitary tax proposal. 86:228.
Virgin Islands
investment corporation headquarters. 86:183.

Foreign taxes
Credit for, see "Credits against tax."

Forms in use
Currency transactions
Form 4789. 86:120.
IC-DISCs. 86:383.
OID. 86:303.
Substitute forms. 86:185.

Gains and losses
Amount realized
nonrecourse debt. 86:460.
At-risk rules
aggregation rule. 86:303.
Boot
dividend equivalence. 86:253.
tax treatment. 86:373.
Capital gains
realization after tax reform. 86:795.
Capital loss carrybacks
undistributed PHC income. 86:277.
Capital loss carryovers
commodity loss carrybacks. 86:278.
Casualty losses. 86:568.
Corn Products doctrine
use by holding co. 86:750.
Foreign currency conversion. 86:461.
Improved real property. 86:561.
Installment sales
investment property to related corporations. 86:636.
Mutual fund shares
specific identification. 86:560.
NOLs
acquisitions of property. 86:239.
carryback period
failure to relinquish. 86:312.
carryforwards
tax reform, effect of. 86:85.
computations
lump-sum distributions. 86:557.
nonbusiness items. 86:558.
OID on tax-exempt bonds. 86:240.
Package design costs. 86:498.
Preferred stock
controlling shareholder's surrender. 86:304.
Principal residence
gain rollover and rental losses. 86:472.
Principal shareholder
common stock surrender. 86:457.
Real estate financing. 86:572.
Sec. 1034 gain deferral
Sec. 280A home office. 86:152.
Sec. 1038
liquidating distribution of installment obligation. 86:815.
Stock acquired before 1954
distribution on. 86:754.
Stock sale
characterization of loss. 86:425.
Straddle losses
deductibility. 86:689.
Tax-free exchanges
annuity proceeds reinvested in an annuity. 86:190.
like-kind exchanges
escrow accounts, use of. 86:424.
intent. 86:4.
multiple assets. 86:241.
pitfalls. 86:570.
Transfer in lieu of foreclosure. 86:510.

Gifts
See "Charitable contributions."
Valuation
conditioned on adjustment clause. 86:319.
statute of limitations. 86:286.

Gift tax
Disclaimers. 86:77.
QTIP election deadline. 86:287.

Gross income
Auto lessees claiming ITC
income included. 86:610.
Below-market loans
corporate-shareholder loans. 86:645.
international aspects. 86:94.
Compensation
convertible debentures. 86:38.
fringe benefits. 86:213, 812.
junior stock. 86:38.
original issue discount. 86:28.
personal use of company car. 86:53, 200.
Corporation's loan to shareholder. 86:310.
Deferred compensation
agreements. 86:25.
Disability proceeds
employer-paid premiums. 86:94.
Employer-provided return
preparation service. 86:126.
Forgiveness of debt. 86:508.
Fringe benefits
regulations. 86:119, 200, 213, 812.
Government bonds
Series E and EE. 86:47.
Imputed interest. 86:382.
Joint purchases. 86:642.
Lottery dealer's unsold tickets. 86:605.
OID
bond purchasers
overreporting of income. 86:650.
seller financing. 86:445.
Options
amounts paid for termination. 86:62.
Prepaid items
reduction in purchase price. 86:509.
Sec. 83
convertible debentures. 86:230.
election benefits. 86:33.
restrictions under SEC Rule 144. 86:439.
Tax shelter
defrauded investor's recovery. 86:608.

Insurance
Captive insurance companies
premiums. 86:228, 423.
Malpractice insurance trust
medical corporation. 86:192.

Interest income and expenses
Below-market loans
blended interest rate. 86:189, 400.
international aspects. 86:94.
prepayments. 86:425.
regulations. 86:601.
seller financing. 86:576, 728.
Deferred sales to public agencies. 86:516.
Exempt bonds
loans while holding. 86:322.
Government bonds
Series E and EE. 86:47.
IDB financing
arbitrage rebate requirements. 86:726.
regulations. 86:456.
residential rental projects. 86:53.
small issue limits. 86:302.
Imputed interest. 86:37, 151, 189, 382, 400, 576, 601, 728.
Investment interest
basis of excess expenses. 86:222.
carryover of excess. 86:640.
elections for rental real estate. 86:648.
Mortgage certificates and bonds. 86:812.
Refinanced mortgage
interest deduction. 86:755.
points. 86:456.
Rule of 78's
effect on prepayments. 86:503.

Internal Revenue Service
See also "Procedure and administration."
Practice before. 86:136, 251, 529, 680.
Regulations
final, see particular subject.
highlighted. 86:52, 119, 181, 251, 302, 382, 455, 531, 601, 680, 748, 812.
Rulings, procedures, IRs, etc. 86:303, 456, 531, 748, 812.

Legislation
Excise taxes. 86:119.
Refinancing points. 86:531.
Tax reform, see "Tax reform."
Tax Reform Act of 1986
corporate alternative minimum tax. 86:656.
highlights
corporate. 86:624.
individual. 86:616.
tax shelters. 86:696.
year-end tax planning for individuals. 86:713.
Unitary tax proposal. 86:228.

Liquidation of corporation
Appreciated property distribution after. 86:154.
Foreign parent. 86:785.
Tax reform, effect of. 86:88.
Sales of collapsible corporations. 86:234.
Sec. 337 liquidation
holding entity for real estate. 86:30.
Sec. 338 planning. 86:366.
Sec. 338(h)(10) vs. (h)(9). 86:723.

Partners and partnerships
Allocations
losses due to nonrecourse debts. 86:561, 748.
regulations. 86:182, 328, 472.
Appraisal of partnership property. 86:652.
Classification as partnership. 86:172.
Consolidated partnership proceedings. 86:455.
Conversion of interest
effect on tax year. 86:686.

Key to page references

Pages	Issue	Pages	Issue
86:1–68	Jan. 86	86:397–468	July 86
86:69–132	Feb. 86	86:469–540	Aug. 86
86:133–196	March 86	86:541–612	Sept. 86
86:197–260	April 86	86:613–692	Oct. 86
86:261–324	May 86	86:693–764	Nov. 86
86:325–396	June 86	86:765–828	Dec. 86

The contents of The Tax Adviser *from the date of inception (January 1970) are indexed in the* Accountants' Index, *a publication of the American Institute of Certified Public Accountants.*

Limited partnerships
limited partner's guarantee of partnership debt. 86:362.
increasing limited partner's basis. 86:88.
ITC at-risk rules. 86:89.
potential capital contributions. 86:59.
Liquidation planning. 86:435.
Partnership interest sales regulations. 86:182.
Partnership items. 86:455.
Reimbursed organization and syndication costs deductibility. 86:690.
R&D limited partnerships. 86:550.
Retiring partner
relief of liabilities. 86:166.
Returns. 86:252.
Sec. 754 election
sale of 50% interest. 86:459.
Tax matters partner as notice partner. 86:129.
Termination
effect on basis. 86:367.
vs. withdrawal. 86:606.

Pensions
Acquired pension liabilities. 86:370.
Alternative plan benefits. 86:252.
Amendments. 86:303.
Annuities
loan against. 86:194.
reinvestment in second annuity. 86:190.
Compliance deadlines
relief procedures. 86:499.
Distributions
from disqualified plans. 86:122.
premature
bankruptcy estate not liable.86:287.
time for. 86:281.
Employer liability payments. 86:456.
ESOP
leveraged. 86:280.
Group health plans. 86:497.
Individual retirement accounts
noncontribution penalty. 86:58.
spousal. 86:286.
terminating rollovers. 86:288.
Integration with social security. 86:535.
Keogh deduction limits. 86:368.
Minimum funding standards
spun-off plans. 86:394.
New qualification requirements
failure to meet. 86:369.
Partnership vs. C corp. 86:27.
Prior plan participation. 86:512.
Returns
reliance on trustee to file. 86:458.
Rollovers
qualifying distributions on terminations. 86:371.
Self-employeds
retroactive contribution limits. 86:31.
Simplified employee pensions. 86:254.
Terminations. 86:237.
Vested vacation pay
change in accounting method. 86:224.
Welfare benefit plans. 86:585.

Practice management
Billing and collection procedures. 86:811.
Microcomputers
planning with electronic spreadsheets. 86:40.
Paraprofessionals
use of. 86:810.
Tax planning software. 86:524.
Tax returns
calendar and control system. 86:380.
managing compliance practice. 86:811.
Time reporting and billing. 86:810.

Procedure and administration
See also "Internal Revenue Service" and "Returns."
Assessment
notice to third-party lender. 86:256, 825.
Auto valuation for foreign employees. 86:722.
Below-market loans
blended interest rate. 86:189, 400.
Cash reporting. 86:748.
Church tax inquiries. 86:383.
Computerized filing. 86:383.
Deficiency procedures. 86:819.
Disclosure
return information. 86:52.
Employment taxes
independent contractors. 86:182, 559.
Estimated tax
acquired corp.
pre-affiliation. 86:39.
basis for computations
original vs. amended returns. 86:390.
prior ITC recapture. 86:814.
S shareholders. 86:234.
Extensions for elections. 86:144.
Form 870-AD
effect on refund suit. 86:127.
Income averaging
five-year test. 86:284.
innocent spouse. 86:255.
Information reporting
public employees. 86:252.
Innocent spouse provisions. 86:294.
Investment trusts. 86:303.
IRS examination power
foreign records. 86:221.
New financial products. 86:531.
Notice of assessment
third-party lender. 86:538.
Penalties
IRA noncontribution. 86:58.
underpayment. 86:231.
Practice before IRS. 86:136, 251, 529.
Prefiling notification. 86:388
Refunds
negligence penalty still imposed. 86:795.
wire transfers. 86:227.
Return filed without W-2. 86:320.
Return preparer
avoiding penalties. 86:569.
computerized tax preparation service. 86:128.
definition. 86:740.
Sec. 2039(f)(2) election
effect of accountant's error. 86:682.
Self-employment tax. 86:271.
Substitute tax forms
guidelines. 86:185.
Summonses
administrative. 86:601.
Tax Court rules. 86:303.
Tax matters partner as notice partner. 86:129.
Tax shelter registration. 86:302.
Trade or business status. 86:112.
Unisex annuity tables. 86:302.
Unregistered obligations. 86:749.
Withholding taxes
employer's failure to deduct. 86:195.
vacation home buyer. 86:280.

Redemptions of stock
Annual stock redemption agreements. 86:33.
Attribution rules
family discord. 86:684.
Consulting arrangements. 86:92.
Installment redemptions. 86:448.

Reorganizations and corporate divisions
AT&T shareholders
stock distributed on divestiture. 86:384, 566.
Boot
dividend equivalence. 86:253.
tax treatment. 86:373.
C type reorganization
delayed liquidation. 86:34.
new requirement. 86:281.
Foreign-to-foreign stock purchase. 86:784.
F type reorganization
NOL carryback. 86:603.
Incorporation of division
before disposition. 86:366.
Mergers
holding company into wholly owned sub
continuity of business test. 86:184.
Mutual stock disposition
NOL carryovers. 86:363.
Property transferred subject to liabilities. 86:727.
Reverse triangular mergers. 86:72.
Sec. 338 election
effect on ITC. 86:164.
planning. 86:34.
purchase price allocations. 86:793.
regulations. 86:181, 251, 456, 531.
S corporation as purchaser. 86:637.
Sec. 351
market discount. 86:288.
Sec. 304 overlap. 86:87.
Sec. 355
active business requirements. 86:817.
Tax-free reorganization
improper accounting method. 86:507.
Transfer of assets
wholly owned corp.
no stock issued. 86:55.

Returns
See also "Procedure and administration."
Computerized filing. 86:383, 570.
Consolidated returns, see "Consolidated returns."
Filing without W-2. 86:320.
Joint returns
innocent spouse provisions. 86:294.
LIFO election
Form 970 nonfiling. 86:650.
Partnership returns. 86:252.
Pension plans
reliance on trustee to file. 86:458.
Return information
disclosure of. 86:52.
Sec. 6661
adequate disclosure. 86:462.

S corporations
Below-market loans
from shareholders. 86:156.
Conversions after tax reform. 86:789.
Definition. 86:812.
Distributions of AE&P. 86:642.
Inadvertent terminations
IRS waiver. 86:367, 760.
Planning
former C corporation. 86:165.
Qualification requirements. 86:724.
Sec. 337. 86:514.
Sec. 338 stock purchase. 86:226, 637.
Shareholder-guaranteed debt. 86:721.
Shareholder's estimated tax. 86:279.
Stock basis
effect of shareholder loan guarantee. 86:191.
loans to maintain. 86:159.
Stock sale
closing corporation's books. 86:502.
Transnational transactions. 86:37.

State taxes
Intangible assets
taxable situs. 86:564.
Use tax
aircraft used in interstate commerce. 86:155.

Stock
Redemptions, see "Redemptions of stock."

Tax-exempt organizations
Hospital service income. 86:303.
Private foundations
self-dealing. 86:285.

Tax-free exchanges
See "Gains and losses."

Tax preference items
AMT and regular tax computations. 86:463.
Minimum tax
effect of tax benefit rule. 86:161.
New corporate AMT. 86:656.
Nonalternative tax itemized deductions. 86:455, 567.
State and local tax payments. 86:646.

Tax reform
Foreign tax credit. 86:99.
Liquidation of corporation. 86:88.
NOL carryforwards. 86:85.
Tax Reform Act of 1986
capital gain realization. 86:795.
corporate alternative minimum tax. 86:656.
foreign provisions. 86:768.
highlights
corporate. 86:624.
individual. 86:616.
oil and gas industry. 86:777.
S corporation conversions. 86:789.
tax shelters. 86:696.
year-end planning for individuals. 86:713.

Tax straddles
Commodity dealer. 86:316.
Deductibility of losses. 86:689.
Temporary regulations. 86:251.

Trusts and estates
See "Estate planning."

Windfall profit tax
Net profits interest. 86:383.